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October 2, 2023

Mr. David Pritchard
Ms. Libby Rogers
Asst. U.S. Atty.
Odell Horton Federal Building
167 North Main Street, Room 800
Memphis, TN 38103

Ms. Kathryn Gilbert
Special Litigation Counsel
950 Pennsylvania Ave., NW
Washington, DC 20530

Re: United States v. Demetrius Haley,
WD Tenn. No. 23-20191

Dear Counsel:

Pursuant to Brady v. Maryland, 373 U.S. 83 (1963) and its progeny; Fed.R.Crim.P. 5(f); and the order entered as R. 15 herein, Mr. Haley specifically requests any and all information or material including, but not limited to, witness identification/statements, audio, video (including enhanced), or test results which may tend to suggest that Tyre Nichols attempted to reach for a gun or other weapon while engaged with a Memphis Police Department officer(s) on January 7, 2023.

Prompt disclosure is both appropriate and necessary because it is material to the preparation of Mr. Haley's defense.

Sincerely,

S/Michael J. Stengel

cc: Demetrius Haley
cc: Clerk, United States District Court